

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

**VOTER REFERENCE FOUNDATION,
LLC,**

Plaintiff,

v.

Case No: 1:22-cv-00222-JB-KK

**RAÚL TORREZ, in his official capacity as
New Mexico Attorney General, and
MAGGIE TOULOUSE OLIVER, in her
official capacity as
New Mexico Secretary of State,**

Defendants.

**STIPULATED MOTION TO AMEND THE AGREED PROTECTIVE ORDER FOR
CONFIDENTIAL AND PROPRIETARY INFORMATION [DKT. 94]**

Defendant Raúl Torrez, Attorney General of New Mexico, by and through undersigned counsel and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, hereby moves this Court to enter the “Amendment to Agreed Protective Order for Confidential and Proprietary Information [Dkt. 94]” attached hereto as Exhibit A. In support, Defendant states:

1. Plaintiff has requested a deposition of the Office of the Attorney General pursuant to Rule 30(b)(6) Fed. R. Civ. P.
2. This deposition is scheduled to occur on Monday, March 13, 2023.
3. Defendant filed his objections thereto on February 22, 2023, claiming, *inter alia*, privilege under the attorney-client and investigative privileges and under the work product doctrine. *See* Exhibit B.

4. Without waiving such privileges, Defendant and Plaintiff have agreed that limited questioning will be permitted on topics 1-3 as stated in the attached proposed order. Exhibit A.

5. The Proposed Agreed Order is necessary to provide sufficient responses to Plaintiff's discovery requests while permitting Defendant to preserve its assertions of the attorney-client, work product, and investigative privileges.

6. Because the Parties stipulate that the proposed Agreed Protective Order is necessary, good cause exists for its entry. The parties therefore respectfully request this Motion be granted and the Court enter the attached amendment to its previously entered protective order.

Respectfully Submitted:

By: /s/Erin E. Lecocq
Erin E. Lecocq
Kelsey Frobisher Schremmer
Jeff Dan Herrera
Assistant Attorneys General
Office of the New Mexico Attorney General
408 Galisteo Street
Santa Fe, NM 87501
(505) 490-4060
elecocq@nmag.gov
kschremmer@nmag.gov
jherrera@nmag.gov

CERTIFICATE OF SERVICE

I certify that on March 10, 2023, I served the foregoing on counsel of record for all parties via the CM/ECF system.

/s/Erin Lecocq